REMARKS

Claims 1-28, 54 and 55 are presented for examination. All of the claims are rejected under 35 U.S.C. § 103(a).

A summary of our July 26, 2006 interview accompanies this response.
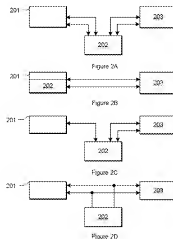
Technology Tutorial

Applicants believe that a brief discussion of the technology disclosed in this application and the cited references would assist the Examiner.

This Disclosure

This application discloses a listening device that unobtrusively listens to a communication channel and keeps track of a controller's definitions of reports and trigger conditions. When the tool responds to a report request or trigger, in accordance with a stored report definition, the removable listening device is ready to combine the context-setting of the controller's report definitions with the context-sensitive data reported by the tool to generate a context-insensitive report. It does not define reports to be generated; it listens and translates.

FIGS. 2A, C and D contrast a removable listening device that hosts logic to carry out the claimed method with FIG. 2B, which depicts a software module running on the controller that is issuing the report definitions, report trigger instructions and report requests. The contrast between a removable listening device and a controller hosted approach is described in the application at [0012], as amended in the response mailed 21 July 2005.

Figure 2A

Figure 2B

Figure 2C

Figure 2D

Patent No. 7,072,985 uses the terms "context-sensitive data" and "context-insensitive reports" to distinguish between data that cannot be interpreted without cross-reference to a report definition or similar request for data (context-sensitive data) and data which has been tagged or labeled so that it can be interpreted without reference to the report definition (context-insensitive). In the '985 patent, context-sensitive and context-insensitive are contrasted in columns 3-11, supported by an embodiment of a translator that converts context-setting report definitions and context-sensitive reported

data into context-insensitive tagged data reports. In the related application section of this application, the text of the '985 patent disclosure is incorporated by reference into this application. In the claims of this application, for instance claim 1, context-sensitive data reported by a tool to a tool host is contrasted with outputting a context-insensitive report in a field tagged format. The field tagged reporting formats specified in dependent claims 7 and 8 (XML and HTML) are recognized as human-readable.

Coss

Coss, Jr. et al (USPN 6,871,112) ("Coss") is a new software module integrated with an incumbent monolithic controller. We have annotated Coss FIG. 2 with the Examiner's analysis, appearing in the margin. The tool host 130 and tool 110 communicate across a wired connection 120. A report generator module 260 runs on the host 130. The report generator 260 issues commands to the application program 210 running on the tool 110, as described by Coss in column 3, line 65 to column 4, line 12. It receives data back from the tool/application program 110/210 and generates reports, much as described in the background section of this application.
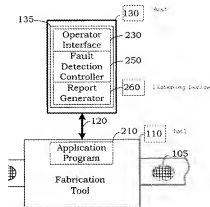

Fig. 2

Walker

Walker et al., High Impedance Probe for Monitoring Fast Ethernet LAN Links (USPN 6,233,613) ("Walker") is the reference on which the Examiner relies for a removable listening device. The probe listens to a wired communication channel without introducing any latency and leaving the communication link undisturbed electrically, because is uses a high impedance termination circuit. *See* Abstract. The probe acts as a tap (col. 3, line 19) that provides access to the communication circuit "for gathering and maintaining statistical information regarding the communication link." Col. 4, lines 2-4. Walker does not suggest applying the high impedance probe in a semiconductor fabrication environment.

Rejection Under 35 U.S.C. § 103(a) of Claims 1-28, 54 and 55

The Examiner rejects **claims 1-28, 54 and 55** under 35 U.S.C. § 103(a) as unpatentable over Coss, Jr. et al (USPN 6,871,112) in view of George (USPN 5,657,252) in view of Walker et al. (USPN 6,233,613).

Claim 1

Claim 1 includes the limitations:

providing a removable listening device to monitor a wired communications channel between one or more tool hosts and one or more tools;

recording report and report trigger definitions sent by the tool hosts to the tools;

matching a first triggered report from the tools with the report and report trigger definitions to generate a first context-insensitive report before processing a second triggered report;

outputting the first context-insensitive report in a field tagged format.

These limitations are not found in Coss-George-Walker.

As discussed during our interview, migrating Coss' report generator 260 onto Walker's high impedance probe would not meet the limitations of the claim, which provides for the tool hosts to define the reports and send the report definitions to the tools. There is no teaching, suggestion or motivation to select just part of Coss's report generator 260 to remove from the host 130 and relocate to Walker's high impedance probe.

Therefore, claim 1 should be allowable over Coss-George-Walker.

Claims 2-5

Claims 2-5 include the limitations:

wherein the report and report trigger definitions and the triggered report are compliant with a SECS protocol.

wherein the report and report trigger definitions and the triggered report are compliant with a HL-7 protocol.

wherein the report and report trigger definitions and the triggered report are compliant with a DIACOM protocol.

wherein the report and report trigger definitions and the triggered report are compliant with a CANS-compliant protocol.

These limitations are not found in Coss-George-Walker. Supposing for the purpose of argument that there are examples of monolithic controller/report generator devices, as in Coss, for each of these protocols, there is motivation, other than from this application, to build a removable listening device with a limited subset of features that monitors communications between the tool host and the tool.

Therefore, claims 2-5 should be allowable over Coss-George-Walker.

<u>Claim 6</u>

Claim 6 should be allowable over Coss-George-Walker for at least the same reasons as claim 1, from which it depends.

<u>Claims 7-12</u>

Claims 7-12, which depend from claims 1 and 2, include limitations specifying the type of field tagged format in which the context-insensitive report is presented. These limitations are not found in Coss-George-Walker. None of the trio of references mentions converting context-sensitive data picked up from a tool host-to-tool communication channel and converting it to a context in-sensitive report by annotating the data with field tags.

Therefore, claims 7-12 should be allowable over Coss-George-Walker.

<u>Claims 13-15</u>

Claims 13-15 should be allowable over Coss-George-Walker for at least the same reasons as claim 1, from which they depend.

<u>Claims 16-28, 54 and 55</u>

Claims 16-28, 54 and 55 are rejected by reference to other rejections, to which we have responded above.

Therefore, claims 16-28, 54 and 55 should be allowable over Coss-George-Walker.

Applicants respectfully submit that claims 1-28, 54 and 55 should be allowable over Coss-George-Walker.

<u>CONCLUSION</u>

Applicants respectfully submit that the pending claims are now in condition for allowance and thereby solicit acceptance of the claims as now stated.

Applicants would welcome an interview, if the Examiner is so inclined. The undersigned can ordinarily be reached at his office at (650) 712-0340 from 8:30 a.m. to 5:30 p.m. PST, Monday through Friday, and can be reached at his cell phone at (415) 902-6112 most other times.

Respectfully submitted,

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